

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

AMATULAH ABDUL

Case No.:

Plaintiff,

vs.

DIVERSIFIED RECOVERY BUREAU, LLC

Defendant.

**DEFENDANT DIVERSIFIED RECOVERY BUREAU, LLC’S
NOTICE OF REMOVAL**

Defendant Diversified Recovery Bureau, LLC (“Defendant”) files this notice of removal of this action from the County Court of Georgia, County of Clayton, to the United States District Court for the Northern District of Georgia as follows:

1. On August 9, 2023, Plaintiff Amatulah Abdul (“Plaintiff”) commenced a civil action against Defendant in the County Court of Georgia, County of Clayton, bearing Index No. 2023-cv-02083.

2. This is a civil action requesting damages for negligence and under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”) in connection with the recovery of a debt owed by Plaintiff.

3. Removal is proper because this case involves a federal question. Therefore, the entire suit is removable under 28 U.S.C. §1441(c).

4. The above-described action is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331 and is one that may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. § 1441(c), in that it is a civil action involving a federal question.

5. In his Complaint, Plaintiff alleges, inter alia, violations of the FDCPA, negligence per se, negligence, and negligent misrepresentation. A true and accurate copy of the Complaint is attached hereto as **Exhibit A**.

6. Removal is timely pursuant to 28 U.S.C. §1446(c) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff's Complaint.

7. Venue is proper in this district under 28 U.S.C. §1441(a) because the state court where the suit has been pending is in this district.

8. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite Exhibit A and incorporated herein by reference.

9. A true and accurate copy of a Civil Cover Sheet is attached hereto as **Exhibit B**.

10. A copy of this Notice of Removal has been sent to Plaintiff and will be filed with the clerk of the Georgia County Court, County of Clayton.

11. For the above reasons, Defendant Diversified Recovery Bureau, LLC requests that this Court assume full jurisdiction over the proceeding as provided by law.

DATED: September 5, 2023

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